

### **REMARKS**

This is in response to the Final Office Action mailed August 23, 2007. Claims 1, 33, 34, and 36 have been amended. Support for currently amended claims 1, 33, 34, and 36 can be found throughout the specification as originally filed, for example, at page 22, lines 20-26. Claims 38-69 are withdrawn. Claims 1-37 remain pending.

No new matter has been added. Amendments to the claims should in no way be construed as an acquiescence to any of the Examiner's objections and/or rejections. Amendments to the claims are being made solely to expedite prosecution of the above-identified application. Applicants reserve the right to prosecute the same or similar claims in the present or another patent application. The amendments made are not related to any issues of patentability.

### **Rejections Under 35 U.S.C. §102/§103(a)**

*Van den Brom et al. (USPN 5,719,111)*

The Office Action has rejected claims 1-9, 11, 13, 15-17, 21, 22, 27-37 under 35 U.S.C. §102/§103(a) over Van den Brom et al. Applicants respectfully traverse this rejection.

Van den Brom et al. discloses a block of *compressed* granular material that comprises a granulated builder material, an alkaline agent and a compressing aid. *See* abstract. Van den Brom et al. discloses that the granulated builder material is mixed with the other components, including the compressing aid, and is compressed in a mould under pressure. *See* col. 3, lines 55-60. Van den Brom et al. also discloses that, preferably, "more than one compaction cycle is applied in order to maximize the block density and quality." *See* col. 3, lines 65-67.

Applicants respectfully submit that Van den Brom et al. does not anticipate the currently claimed invention. Van den Brom et al. does not disclose a solid binding agent comprising

MGDA and water wherein the solid binding agent hardens to a solid form within about 1 minute to about 2 hours. To the contrary, the compositions described by Van den Brom et al. only form into a solid detergent block after multiple compaction steps.

Further, Applicants submit that Van den Brom et al. does not disclose a solid binding agent comprising MGDA and water. No where does Van den Brom et al. disclose a solid composition comprising water and MGDA wherein the water and MGDA cooperate to form a solid binding agent that hardens in about 1 minute to about 2 hours. To the contrary, the granulated builder material disclosed by Van den Brom et al. comprises a builder material, e.g., MGDA, and a co-ingredient. However, water is not disclosed in Van den Brom et al. as a co-ingredient for use with the MGDA to form a builder material.

Applicants also respectfully submit that disclosure in Van den Brom et al. of drying the builder material in a fluid bed to a free moisture content of less than 5% by weight is not the same as admixing water and MGDA to form a solid binding agent as is presently claimed. Van den Brom et al. discloses spray drying only in the context of when the granulation step, i.e., mixing the builder with the co-ingredient, is performed by forming a slurry containing said builder and the co-ingredient. As discussed above, there is no disclosure that water is used as a co-ingredient. For at least the foregoing reasons, Applicants submit that Van den Brom et al. does not anticipate the presently claimed invention.

Likewise, Applicants submit Van den Brom et al. does not render the presently claimed invention obvious. As discussed above, Van den Brom et al. fails to teach or suggest all of the features of the presently claimed invention. Further, Applicants submit that the required compaction steps taught by Van den Brom et al. teach away from the solid binding agent which hardens into a solid form in about 1 minute to about 2 hours as is presently claimed. That is, one

of skill in the art would not have a reasonable expectation of success in forming a solid binding agent from a composition comprising MGDA and water without the use of compression at high pressures, e.g., 3-30 kN/cm<sup>2</sup>, based on the teachings of Van den Brom et al. Accordingly, Applicants respectfully request withdrawal of this rejection.

*Yamaguchi et al. (EP 0882786A)*

The Office Action has rejected claims 1-25 and 31 under 35 U.S.C. §102/§103(a) over Yamaguchi et al. Applicants respectfully traverse this rejection.

Yamaguchi et al. teaches a high density powdered detergent composition comprising a glycine N,N-diacetic acid derivative, a nonionic surfactant, an anionic surfactant, and an aluminosilicate. Yamaguchi et al. does not teach a solid composition comprising a binding agent comprising MGDA and water that hardens to a solid form in about 1 minute to about 2 hours. Although Yamaguchi et al. discloses forming aqueous slurries comprising MGDA among other ingredients, the detergent compositions of Yamaguchi et al. do not comprise water and MGDA as they are spray dried, i.e., the moisture is removed. Further, Yamaguchi et al. does not disclose compositions that harden to solid form within about 1 minute to about 2 hours, as the compositions are subjected to spray drying in order to form particles. Applicants submit therefore that Yamaguchi et al. does not anticipate the presently claimed invention. Accordingly, Applicants respectfully request withdrawal of this rejection.

Applicants also submit that Yamaguchi et al. does not render the presently claimed invention obvious. As discussed above, Yamaguchi et al. does not teach or suggest a solid composition comprising a solid binding agent comprising MGDA and water that hardens to a solid form in about 1 minute to about 2 hours. Applicants submit that Yamaguchi et al. teaches

away from the presently claimed invention, as Yamaguchi et al. relies on spray drying to achieve solid particles. Accordingly, Applicants respectfully request withdrawal of this rejection.

*Williams (US 6162259)*

The Office Action has rejected claims 1-37 under 35 U.S.C. § 102(b) as anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as obvious over Williams. Applicants respectfully traverse this rejection.

Williams is directed to a detergent that includes MGDA to aid in dissolution of a product and therefore help in preventing deposit formation. Williams does not disclose a solid binding agent composition comprising MGDA and water that hardens to form a solid in about 1 minute to about 2 hours. Nor does Williams disclose forming such a composition by admixing MGDA and water.

To the contrary, no where does Williams disclose that water is added to the detergent compositions. Williams only discloses in the Examples that the compositions comprise “Misc inc moisture to balance pH (1% solution).” The source of the miscellaneous ingredients, including moisture, is not disclosed by Williams. Therefore, the moisture present in Williams is not necessarily from water added to the composition, but may be from water associated with one or more of the other components of the compositions. Applicants respectfully submit that this does not teach a solid binding agent composition comprising water and MGDA that hardens to form a solid in about 1 minute to about 2 hours. Therefore, the teachings of Williams do not anticipate the presently claimed invention. Accordingly, Applicants request withdrawal of this rejection.

As discussed above, Applicants submit that Williams does not teach or suggest each of the features of the presently claimed invention. Nor has the Office Action pointed to anything in the art generally that would suggest the presently claimed invention. Thus, Applicants submit Williams does not render the presently claimed invention obvious. Accordingly, Applicants respectfully request withdrawal of this rejection.

### **Summary**

It is respectfully submitted that each of the pending claims is in condition for allowance, and notification to that effect is kindly requested. The Examiner is invited to contact the Applicants' primary attorney-of-record, Anneliese S. Mayer, at (651) 795-5661, if it is believed that prosecution of this application may be assisted thereby.



Respectfully submitted,

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